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Wilton, Maine 04294
May 21 1999 MAY 10 P2:51

Docket Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

Re: Docket # 98N-1038, Irradiation in the Production,
Processing, and Handling of Food

To whom it may concern:

I urge that the FDA keep its current policies regarding the labeling of irradiated foods. The law should not be changed. Current terminology of "treated with radiation" or "treated by irradiation," and the use of the radura symbol on all irradiated whole foods should continue to be used and not be allowed to expire. Furthermore, any phrasing involving the word "pasteurization" should not be allowed under any circumstance because it would be inherently misleading.

In its initial petition, the FDA concluded that irradiation is a "material fact" about the processing of a food, and thus should be disclosed when it occurs. The material fact remains and the labeling should remain.

Irradiation can affect storage qualities, spoilage characteristics and texture. Irradiated fruits and vegetables have nutrient losses that are not obvious or expected by the consumer. In addition, irradiation causes chemical changes that are not evident and are potentially hazardous. Meats may have a higher level of carcinogenic benzene. All irradiated foods contain unique radiolytic products that have never been tested. Irradiation is a new technology with no long-term human health studies. Consumers have the right to know if foods they are considering buying have been subject to irradiation.

The label should be large enough to be easily visible to the consumer, on the front of the package. Labels contain important information regarding the processing of foods. For displayed whole foods such as produce, a prominently displayed poster containing the term "irradiation" and the radura should be required. As a consumer I want this information.

Yours truly,

Pamela Prodan

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98N-1038

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